

**LEGAL ANALYSIS SYSTEMS**

**EXHIBIT A**

**Review, work on plan documents/rulings (10.30 Hours; \$6,550.00)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	5.10	\$800	4,080.00
Relles	5.20	\$475	2,470.00

<u>Trans</u>	<u>Empl</u>	<u>Bill</u>	<u>Billing</u>	<u>Full Narrative</u>
<u>Date</u>	<u>Name</u>	<u>Rate</u>	<u>Hours</u>	
09/01/10	Peterson	800.00	0.70	Review Unsecured Creditors motion re: trust data and estimation
09/01/10	Peterson	800.00	0.60	Review confidentiality provisions
09/09/10	Relles	475.00	1.50	Send emails to data privacy experts
09/10/10	Peterson	800.00	0.50	Telephone Relles and Wehner re: Bates data request
09/10/10	Peterson	800.00	1.00	Telephone Relles and Sweeney re: privacy protection
09/10/10	Peterson	800.00	0.30	Review data confidentiality proposal
09/10/10	Relles	475.00	0.50	Telephone Peterson and Wehner re: Bates data request
09/10/10	Relles	475.00	1.00	Telephone Peterson and Sweeney re: privacy protection
09/16/10	Relles	475.00	0.50	Email Sweeney re: data privacy consulting
09/27/10	Peterson	800.00	1.50	Address data anonymity issues
09/27/10	Peterson	800.00	0.50	Telephone Relles re: anonymity issues
09/27/10	Relles	475.00	0.50	Telephone Peterson re: anonymity issue
09/27/10	Relles	475.00	1.20	Read anonymity proposal

**Total Task Code (a) 10.30**

**Confer with Committee, Professionals (27.90 Hours; \$ 18,712.50)**

<u>Professionals</u>		<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson		16.80	\$800	13,440.00
Relles		11.10	\$475	5,272.50

  

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/23/10	Peterson	800.00	0.60	Telephone Relles re: discuss claims data, analyses and conference call on those issues.
06/23/10	Peterson	800.00	0.40	Telephone Swett re: discuss claims data and preliminary analyses.
06/23/10	Relles	475.00	0.60	Telephone Peterson re: discuss claims data, analyses and conference call on those issues.
06/24/10	Peterson	800.00	1.00	Conference call with Swett, Esseman, ARPC, and Relles re: discuss possible sources of additional claims data and possible acquisition of such data.
06/24/10	Relles	475.00	1.00	Conference call with Swett, Esseman, ARPC and Peterson re: discuss data needs.
06/25/10	Peterson	800.00	0.30	Telephone Relles re: plan upcoming conference call with Swett and materials for call.
06/25/10	Peterson	800.00	0.50	Review materials prepared for conference call with Swett.
06/25/10	Peterson	800.00	1.20	Conference call with Swett and Relles re: discuss data, analyses of data, and preliminary results.
06/25/10	Relles	475.00	2.80	Prepare inputs for phone call with Swett and Peterson.
06/25/10	Relles	475.00	0.30	Telephone Peterson re: plan upcoming conference call with Swett and materials for call.

06/25/10	Relles	475.00	1.20	Conference call with Swett and Peterson re: data and preliminary results.
07/01/10	Peterson	800.00	0.50	Preparation for conference call with Swett and FCR attorneys.
07/01/10	Peterson	800.00	0.50	Conference call with Swett and FCR attorneys and experts re data issues.
07/03/10	Peterson	800.00	1.00	Review FCR request for production about claims data.
07/26/10	Relles	475.00	0.30	Email Swett re: new files on MLC website.
08/02/10	Peterson	800.00	0.80	Conference call with Swett and Relles
08/02/10	Peterson	800.00	1.00	Review and respond to Swett memo on data issues
08/02/10	Relles	475.00	0.80	Conference call with Swett, Inselbuch, and Peterson re: identifying data requirements
08/03/10	Relles	475.00	0.50	Review Swett memo
08/11/10	Peterson	800.00	1.50	Review order re: Trust discover and UCC motion on the matter
08/18/10	Peterson	800.00	0.50	Telephone Swett re: Integrated Confidentiality Statement
08/19/10	Peterson	800.00	0.60	Review email (.2) and telephone Swett (.4) about use and confidentiality of Social Security numbers in claims databases
08/30/10	Peterson	800.00	0.40	Telephone Cooney re: MLC data
08/30/10	Peterson	800.00	2.80	Review, assemble and sent information requested by Cooney
09/06/10	Peterson	800.00	0.20	Send tables of claims data to Swett
09/09/10	Peterson	800.00	0.50	Telephone Wehner and Relles re: discuss data privacy issues

09/09/10	Relles	475.00	0.50	Telephone Wehner and Peterson re: discuss data privacy issues
09/15/10	Peterson	800.00	1.00	Conference call with Committee about completeness of MLC data
09/15/10	Peterson	800.00	0.50	Telephone Relles re: discuss committee meeting in Chicago
09/15/10	Relles	475.00	0.50	Telephone Peterson re: discuss committee meeting in Chicago
09/16/10	Relles	475.00	1.40	Review and process cd-rom sent by Wehner
09/19/10	Relles	475.00	1.00	Work on memo to Inselbuch re: discrepancies between MLC and law firm data
09/20/10	Peterson	800.00	1.00	Telephone Inselbuch re: forecasts and completeness of MLC data and preparation for call
09/27/10	Relles	475.00	0.20	Telephone Swett re: data anonymity proposal

**Total Task Code .A 27.90**

**Analyses of Claims Database (104.80 Hours; \$ 68,955.00)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	59.00	\$800	47,200.00
Relles	45.80	\$475	21,755.00

  

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/08/10	Peterson	800.00	0.30	Telephone Relles re: discuss MLC claims data and data from proofs of claim in bankruptcy.
06/08/10	Peterson	800.00	1.30	Review claims data and bar date data and explanations of claims data.

06/08/10	Relles	475.00	3.20	Integrate pre-bankruptcy data with bar date data..
06/08/10	Relles	475.00	0.30	Telephone Peterson re: discuss data and simple summaries of the data.
06/14/10	Relles	475.00	2.20	Work on building analytical database.
06/24/10	Peterson	800.00	0.10	Telephone Relles re: discuss Bar date documentation; poof of claim forms, instructions, etc.
06/24/10	Peterson	800.00	1.70	Review Relles' archives of all currently available material on MLC liability and data.
06/24/10	Peterson	800.00	0.80	Review bar data order, proof of claim form and instructions for form in order to understand POC data and potential uses.
06/24/10	Relles	475.00	0.10	Telephone Peterson re discuss Bar date documentation; proof of claim forms, instructions, etc.
07/02/10	Peterson	800.00	2.60	Review claims data regarding nature of claims.
07/05/10	Relles	475.00	1.00	Review latest Alix data on defense costs and bankruptcy claims.
07/14/10	Peterson	800.00	2.00	Review claims value data and trends.
07/14/10	Relles	475.00	1.60	Update information on claims value trends.
07/26/10	Relles	475.00	0.80	Identify and examine new files from Alix.
08/01/10	Peterson	800.00	0.70	Telephone Relles re: differences in payment rates and payment values between early and recent GM settlements
08/01/10	Peterson	800.00	3.80	Analysis of settlement values by law firm and state and years of settlement
08/01/10	Relles	475.00	4.90	Investigate differences in payment rates and payment values between early and recent GM settlements

08/01/10	Relles	475.00	0.70	Telephone Peterson re: differences in payment rates and payment values between early and recent GM settlements
08/02/10	Peterson	800.00	2.20	Review GM settlement history with particular law firms
08/03/10	Peterson	800.00	1.00	Review GM settlement history with particular law firms
08/04/10	Peterson	800.00	2.00	Interview Thiel about law firm's settlement history with GM, review claims data for call
08/04/10	Relles	475.00	0.40	Telephone Matthew Thiel (Kazan law firm) re: discuss Kazan firm settlements
08/05/10	Relles	475.00	3.70	Rebuild analytical files, eliminating duplicates, developing law firm identifiers, and adding exposure indices
08/05/10	Relles	475.00	5.00	Analyze factors affecting payment amounts
08/12/10	Peterson	800.00	3.20	Review subsidiaries and explore potential asbestos liabilities
08/12/10	Peterson	800.00	2.50	Analyses of variables potentially related to settlement values
08/12/10	Peterson	800.00	0.50	Telephone Relles re: analyses of variations in settlement values
08/12/10	Relles	475.00	3.70	Estimate effects for trial listed claims
08/12/10	Relles	475.00	0.50	Telephone Peterson re: analyses of variations in settlement values
08/13/10	Peterson	800.00	1.50	Review SF-DCT claims processing report for July 2010
08/13/10	Peterson	800.00	1.20	Telephone Relles re: factors affecting settlement values
08/13/10	Peterson	800.00	2.00	Review MLC settlement data

08/13/10	Peterson	800.00	3.40	Review and search for information on GM subsidiaries
08/13/10	Relles	475.00	1.20	Telephone Peterson re: factors affecting settlement values
08/18/10	Peterson	800.00	1.00	Review draft of Integrated Confidentiality Statement
08/20/10	Peterson	800.00	2.70	Investigate businesses and possible involvement of subsidiaries with asbestos
08/22/10	Relles	475.00	4.80	Extract and organize 28 Access databases from cd-rom
08/22/10	Relles	475.00	1.70	Review contents of databases
08/23/10	Peterson	800.00	6.70	Review interrogatories
08/23/10	Relles	475.00	0.90	Download and organize latest data from Alix
08/23/10	Relles	475.00	1.60	Download and organize interrogatories
08/23/10	Relles	475.00	2.40	Review interrogatories
08/24/10	Peterson	800.00	3.70	Review interrogatories
08/25/10	Peterson	800.00	1.50	Review order regarding trust's data
08/26/10	Peterson	800.00	0.40	Review emails re: data on subsidiaries
08/27/10	Relles	475.00	3.40	Organize tiff files and review and summarize contents of same
08/30/10	Peterson	800.00	3.80	Investigate settlement amounts and trends
09/09/10	Peterson	800.00	1.00	Review summary statistics on GM's past asbestos litigation
09/10/10	Peterson	800.0	1.10	Review alternative forecasts on GM's past asbestos litigation
09/15/10	Peterson	800.00	1.00	Review summary statistics
09/15/10	Relles	475.00	1.70	Process recently received data for

information on pre-petition pending claims

09/18/10	Peterson	800.00	1.20	Review analyses of completeness of data
09/19/10	Peterson	800.00	1.60	Review analyses of completeness of data
09/24/10	Peterson	800.00	0.50	Review FCR questions, GM answers on data

**Total Task Code .B 104.80**

**Estimate Debtor's Liability (20.40 Hours; \$ 11,672.50)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	6.10	\$800	4,880.00
Relles	14.30	\$475	6,792.50

  

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/17/10	Peterson	800.00	0.50	Telephone Relles re: discuss claims and liability forecasts.
06/17/10	Peterson	800.00	2.00	Review summary of key forecasting parameters and preliminary forecasts.
06/17/10	Relles	475.00	2.50	Develop claims and liability forecasts.
06/17/10	Relles	475.00	0.50	Telephone Peterson re: discuss results of claims and liability forecasts.
06/23/10	Relles	475.00	1.00	Organize materials for Peterson phone call re: discuss liability estimation.
06/24/10	Peterson	800.00	1.20	Telephone Relles re: discuss extent, uses and limitations of data on past claims and resolutions for estimating liabilities.
06/24/10	Relles	475.00	0.50	Review all data, analyses and files to date in preparation for call about liability analyses.



06/24/10	Relles	475.00	1.20	Telephone Peterson re: discuss analysis of liabilities and problems with data.
06/24/10	Relles	475.00	1.20	Update analysis of liabilities.
7/31/10	Relles	475.00	3.40	Run additional variations of MLC projections.
09/13/10	Relles	475.00	0.60	Telephone Peterson re: discuss liability estimates
09/09/10	Peterson	800.00	0.50	Telephone Relles re: discuss liability projection methods
09/09/10	Relles	475.00	0.50	Telephone Peterson re: discuss liability projection methods
09/10/10	Peterson	800.00	1.30	Telephone Relles re: review projections
09/10/10	Relles	475.00	1.60	Update liability projections
09/10/10	Relles	475.00	1.30	Telephone Peterson re: review projections
09/13/10	Peterson	800.00	0.60	Telephone Relles re: discuss liability estimates

**Total Task Code .C            20.40**

**Research on Claims and Settlements (57.60 Hours; \$34,055.00)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	20.60	\$800	16,480.00
Relles	37.00	\$475	17,575.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
09/08/10	Peterson	800.00	0.30	Telephone Relles re: assembling additional information for attorney surveys
09/08/10	Peterson	800.00	1.10	Review data on settlements by law firms

09/08/10	Peterson	800.00	1.00	Telephone Angelides re: settlements with GM
09/08/10	Peterson	800.0	0.30	Email to Steve Baron regarding prepetition GM settlements
09/08/10	Relles	475.00	1.80	Prepare files for attorney surveys
09/08/10	Relles	475.00	0.30	Telephone Peterson re: assembling additional information for attorney surveys
09/09/10	Peterson	800.00	0.50	Telephone Relles re: discuss settlement strategies
09/09/10	Peterson	800.00	0.60	Review and organize notes from Simmons calls; review settlement history
09/09/10	Relles	475.00	0.50	Telephone Peterson re: discuss settlement strategies
09/16/10	Peterson	800.00	2.50	Telephone law firms about data on settlements
09/17/10	Peterson	800.00	1.10	Compare Simmons and MLC data on settled claims
09/17/10	Relles	475.00	5.50	Link claims data to information from law firms to identify discrepancies in MLC settlement data
09/18/10	Peterson	800.00	0.70	Telephone Relles re: discuss discrepancies between MLC and law firm settlement data
09/18/10	Relles	475.00	5.70	Work on identifying and summarizing discrepancies between MLC and law firm settlement data
09/18/10	Relles	475.00	0.70	Telephone Peterson re: discuss discrepancies between MLC and law firm settlement data
09/19/10	Peterson	800.00	0.80	Telephone Relles re: completeness of MLC settlement data (several calls)
09/19/10	Peterson	800.00	2.50	Draft memo on completeness of MLC settlement data
09/19/10	Relles	475.00	4.70	Work on identifying and summarizing

discrepancies between MLC and law firm settlement data

09/19/10	Relles	475.00	1.70	Update MLC database with information from law firms
09/19/10	Relles	475.00	0.80	Telephone Peterson re: completeness of MLC settlement data (several calls)
09/20/10	Peterson	800.00	0.30	Telephone Relles re: discuss getting data from law firms
09/20/10	Peterson	800.00	0.30	Review Kazan firm settlements
09/20/10	Peterson	800.00	1.30	Emails to law firms about lists of settlements
09/20/10	Relles	475.00	0.30	Telephone Peterson re: discuss getting data from law firms
09/20/10	Relles	475.00	0.40	Email Pacheco (Wilentz firm) re: correspondence between law firm and MLC settlement data
09/20/10	Relles	475.00	0.30	Email correspondence with Pacheco
09/20/10	Relles	475.00	0.30	Discuss getting data from law firms
09/21/10	Peterson	800.00	0.20	Emails re: completeness of settlement data
09/21/10	Peterson	800.00	1.00	Review additional data on GM settlements, compare to MLC settlement data
09/21/10	Relles	475.00	2.60	Compare settlements submitted by law firms to MLC settlement data
09/25/10	Relles	475.00	1.70	Determine overlap between MLC settlement data and a specific law firm
09/29/10	Peterson	800.00	1.20	Review new data on settlements
09/29/10	Relles	475.00	2.60	Organize law firm data
09/30/10	Peterson	800.00	0.40	Telephone Relles re: results of law firm / MLC file merge

09/30/10	Peterson	800.00	1.50	Emails with law firms about settlement data
09/30/10	Peterson	800.00	3.00	Review new data on settlements
09/30/10	Relles	475.00	3.90	Reconcile law firm / MLC file differences, update payment estimates based on law firm data
09/30/10	Relles	475.00	2.80	Summarize differences for discussion with Caplin-Drysdale
09/30/10	Relles	475.00	0.40	Telephone Peterson re: results of law firm / MLC file merge

**Total Task Code (e) 57.60**

**Research Obtain Other Data (27.80 Hours; \$ 13,719.00)**

<u>Professionals</u>		<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson		8.00	\$800	6,400.00
Relles		4.90	\$475	2,327.50
Ebener		14.90	\$335	4,991.50

  

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/01/10	Ebener	335.00	0.20	Review coder question on jury verdict report.
06/02/10	Ebener	335.00	0.10	Reply to coder question on jury verdict report.
06/07/10	Ebener	335.00	0.20	Check with Dahl Inc. on status of data capture.
06/08/10	Ebener	335.00	0.40	Provide specifications to Dahl Inc for date capture of additional injured persons form.
06/09/10	Ebener	335.00	0.40	Preliminary review of the primary data entry file.
06/10/10	Ebener	335.00	0.30	Check coder hours for accuracy.
06/10/10	Ebener	335.00	0.40	Review scan of sampled cases.

06/10/10	Ebener	335.00	0.10	Check on status of data entry file.
06/10/10	Ebener	335.00	0.10	Provide FedEx instructions.
06/10/10	Ebener	335.00	0.50	Create additional injured parties file layout.
06/11/10	Ebener	335.00	0.10	Email Dahl Inc. with receipt confirmation for data file.
06/14/10	Ebener	335.00	0.50	Check data entry file transmittal for accuracy.
06/14/10	Ebener	335.00	0.10	Email Dahl Inc. to schedule residual data capture.
06/15/10	Ebener	335.00	0.50	Transmit completed coding forms to Dahl, Inc. for data capture.
06/16/10	Ebener	335.00	0.10	Check with Dahl Inc. on receipt of data transmittal.
06/16/10	Ebener	335.00	0.20	Email Dahl Inc. with instructions on data capture.
06/16/10	Peterson	800.00	0.30	Telephone Relles re: discuss data collection on verdicts and data on verdicts involving GMC.
06/16/10	Peterson	800.00	0.30	Review data on verdicts involving GMC.
06/16/10	Relles	475.00	1.10	Search Mealey's archives for cases involving General Motors.
06/16/10	Relles	475.00	0.30	Telephone Peterson re: discuss data collection on verdicts and data on verdicts involving GMC.
06/18/10	Ebener	335.00	1.00	Review updated to data entry file.
06/18/10	Ebener	335.00	1.00	Inventory records in data entry file.
06/18/10	Peterson	800.00	3.00	Check coding against reporter.
06/21/10	Ebener	335.00	2.00	Check coding against data entry file.
07/01/10	Peterson	80000	2.80	Review list of subsidiaries and research asbestos issues among subsidiaries.
07/14/10	Peterson	80000	1.20	Review preliminary data on verdict trends.

07/28/10	Peterson	80000	3.40	Review materials on GM asbestos litigation, including Mea leys and internet as additional sources.
09/04/10	Ebener	335.00	1.50	Audit data file in advance of delivery
09/05/10	Ebener	335.00	0.50	Transmit data files and documentation to Relles for Injured Party and Additional Injured Party cases
09/16/10	Ebener	335.00	1.00	Research response to query from Relles
09/16/10	Ebener	335.00	0.30	Prepare email response on query for Relles
09/16/10	Relles	475.00	1.40	Work on organizing jury verdict data
09/20/10	Ebener	335.00	0.20	Review set of variables from Relles for case inventory audit
09/20/10	Ebener	335.00	0.20	Confirm receipt of needed variables from Relles
09/20/10	Relles	475.00	1.70	Work on organizing jury verdict data
09/20/10	Relles	475.00	0.40	Email Ebener re: jury verdict data

**Total Task Code .F 27.80**

**Other Experts, Evaluate, Confer (11.30 Hours; \$ 6,017.50)**

<u>Professionals</u>		<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson		2.00	\$800	1,600.00
Relles		9.30	\$475	4,417.50
<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
06/08/10	Relles	475.00	0.20	Email Sims re: discuss database and HR&A's prior usage of same.

06/11/10	Relles	475.00	0.30	Email correspondence with Sims (HR&A) and Brockman (ARPC) re: understanding database contents.
06/11/10	Relles	475.00	0.30	Telephone Sims re: understanding database contents.
06/11/10	Relles	475.00	0.20	Email correspondence with Susan Budd (ALIX) re: understanding database contents.
06/14/10	Relles	475.00	0.50	Conference call with sims and Brockman re: discuss database contents.
07/06/10	Peterson	80000	0.60	Review Florence memo re data request.
07/30/10	Peterson	80000	1.40	Review HR & A Reports.
07/30/10	Relles	475.00	2.20	Review three HR&A reports on GM Liabilities.
08/02/10	Relles	475.00	4.10	Review Rabinovitz report and attempt to replicate HR&A's results
08/02/10	Relles	475.00	0.40	Telephone Sims re: completeness of the GM data
08/02/10	Relles	475.00	0.80	Email Sims re: proposal for a phone conversation
08/25/10	Relles	475.00	0.30	Telephone Sims re: discuss data

**Total Task Code .H 11.30**

**Analysis of other Matters (2.50 Hours; \$ 1,675.00)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	1.50	\$800	1,200.00
Relles	1.00	\$475	475.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/15/10	Peterson	80000	0.50	Telephone Relles re: Budget for August.
07/15/10	Peterson	80000	1.00	Revise budget and categories.
07/15/10	Relles	475.00	0.50	Assemble budget for August.
07/15/10	Relles	475.00	0.50	Telephone Peterson re budget for August.

**Total Task Code .K            2.50**

**Review, work on plan Docs/Ruling (7.00 Hours; \$ 5,600.00)**

<u>Professionals</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peterson	7.00	\$800	5,600.00

<u>Trans Date</u>	<u>Empl Name</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/30/10	Peterson	80000	3.80	Review UCC motion and exhibits seeking additional materials and data from trusts.
07/31/10	Peterson	80000	3.20	Review and comment on UCC motion.

**Total Task Code .L            7.00**



Other Charges:

Coding Services	\$ 2,510.26
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